STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission On Its Own Motion)		
Investigation Concerning Illinois Bell Telephone)	Docket No. 01-0662	
Company's compliance with Section 271 of the)		
Telecommunications Act of 1996)		

SBC ILLINOIS' ELEVENTH STATUS REPORT

Illinois Bell Telephone Company ("SBC Illinois" or the "Company"), by its attorneys, hereby files three (3) status reports pursuant to the progress plans implemented by the Company as part of the 271 review process¹. As required under the Plans, SBC Illinois will make periodic status reports to the Commission and will file those status reports in this docket.

In this filing, the Company submits a status report on the following plans:

1. Special and UNE Circuit Repair Coding Accuracy Plan. (Bi-monthly reports of third party examination). The attached report dated September 18, 2003 shows that Bearing Point performed a third party examination of the actions required by the Special And UNE Circuit Repair Coding Accuracy Plan. The report shows that Bearing Point verified that SBC Midwest has implemented the documentation updates, training review sessions and management review activities it committed to undertake. In addition, the report shows that, based on a random selection of commercial troubles reviewed in the month of June, 2003, SBC Midwest achieved a UNE repair coding accuracy of 98.38 percent and met the target accuracy level of 95 percent and

¹ The progress plans implemented by the Company include:

^{1.} Bill Auditability and Dispute Resolution Plan;

^{2.} Change Management Communications Plan;

^{3.} Customer Service Inquiry Accuracy Plan;

^{4.} Directory Listings & Directory Assistance Database Update Accuracy Plan,

^{5.} Line Loss Notifier Communications Plan:

^{6.} Pre-Order Processing Timeliness Plan;

^{7.} Special and UNE Circuit Repair Coding Accuracy Plan; and

also achieved a special repair coding accuracy of 94.12 percent and met the target accuracy level of 90 percent. As a result, no further testing by Bearing Point is required and the final process and transaction reports are completed. Under the terms of the Special And UNE Current Repair Coding Accuracy Plan, no further status reports on third party evaluation of repair coding accuracy will be filed.

- 2. <u>Customer Service Inquiry Plan.</u> The attached report dated September 15, 2003 shows that Bearing Point performed a third party examination of the actions required by the Customer Service Inquiry Accuracy Plan. The report shows that Bearing Point verified that SBC Midwest has implemented the training and management review activities it committed to undertake. In addition, the report shows that, based on a random selection of commercial transactions, SBC Midwest accurately updated 99.1 percent of its customer records and met the accuracy target of 95 percent. As a result, no further testing by Bearing Point is required and the final process and transaction reports are completed. Under the terms of the Customer Service Inquiry Accuracy Plan, no further status reports on third party evaluation will be filed.
- 3. <u>Directory Listings & Directory Assistance Database Update Accuracy Plan.</u>
 Bimonthly reports, beginning June, 2003 are due under this plan until final process and transaction reports are completed. Attached to this Status Report is the final process and transaction report for the Directory Listings & Directory Assistance Database Update Accuracy Plan dated September 15, 2003. Under the terms of that plan, no further status reports on Directory Listings and Directory Assistance Database Update Accuracy will be filed.

^{8.} Service Order Completion Timeliness Plan (hereinafter, the "Plans").

Respectfully submitted,

ILLINOIS BELLATELEPHONE COMPANY

me of its Attorneys

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CERTIFICATE OF SERVICE

I, Mark R. Ortlieb, an attorney, certify that a copy of the foregoing SBC ILLINOIS' ELEVENTH STATUS REPORT was filed with the Commission via e-docket and served upon all parties electronically on this 23rd day of September, 2003. ou Rall

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Customer Service Inquiry Accuracy Third Party Examination Results



September 15, 2003

1.0 Introduction

The Customer Service Inquiry Accuracy Plan¹ ("the Plan") provides a list of the actions SBC Midwest asserted it would take as part of an effort to improve the accuracy of customer service inquiries (CSI)². The actions in the Plan fall into the following two categories:

- a. Service Representative Training: SBC Midwest asserted that it would develop a Service Order Quality informational package for Local Service Center (LSC) service representatives. This package provided information such as the importance of accurate orders and the impacts of inaccurate orders on Competitive Local Exchange Carriers ("CLECs") and end-users. The informational package was to include service order examples and a listing of available on-line resources.
- b. Management Review Activities: SBC Midwest asserted that it would conduct its own internal reviews of UNE-P and Resale production service orders that drop to manual handling to assess whether system and process enhancements and training review sessions achieved the desired effect (i.e., improvement in CSI accuracy).

BearingPoint was selected to perform a third party examination of the actions stipulated in the Plan. The third party examination requirements as stated in the Plan fall into two categories:

- a. The third party will evaluate SBC Midwest's implementations of the actions described in the "Actions" section of the Plan by reviewing documents, conducting interviews, and performing site visits, as deemed necessary by the third party. This evaluation will include a review of SBC Midwest's quality review results.
- b. The third party will report on the accuracy of customer service inquiry updates by comparing the Customer Service Record (CSR) updates requested with the local service requests (LSRs). The sample design and the evaluation methodology for this transaction analysis will be reviewed with SBC Midwest and the respective Commission Staff prior to its implementation.

BearingPoint has fulfilled the third party examination requirements and considers its work completed. This document explains the results of BearingPoint's third party examination.

This issue is related to Exception 31 in the Ohio test and Exception 128 in the Illinois test.



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¹ As filed with the Michigan Public Service Commission on March 13, 2003, the Illinois Commerce Commission on May 1, 2003, the Wisconsin Public Service Commission on July 1, 2003, the Public Utilities Commission of Ohio on July 3, 2003, and the Indiana Utility Regulatory Commission on July 11, 2003.

2.0 Methodology

BearingPoint developed an Examination Approach for the Customer Service Inquiry Accuracy Plan outlining the methodology used for the third party examination. The document describes the fact finding and analysis approach used to assess the evidence of SBC Midwest actions taken and the methodology used in performing a transaction review of commercial transactions to verify the CSI update accuracy.

To evaluate the system and process enhancements made by SBC Midwest, BearingPoint requested artifacts of the enhancements for review. The evaluation of the training review sessions and the management review activities were completed through work center visits and employee interviews. BearingPoint reviewed documentation for pertinent information such as process descriptions, training schedules, employee training records, quality reports, discrepancies identified, root cause of discrepancies identified, and reports used for management oversight.

SBC Midwest provided BearingPoint with a list of all orders that completed during the week of July 21, 2003 to July 25, 2003. The list contained relevant ordering information, as well as the completion date for each of the orders.

BearingPoint selected a sample of 150 orders from the population. BearingPoint reviewed hard copies of the Local Service Requests ("LSRs") for each order. BearingPoint compared the LSRs to the Customer Service Records returned through CSIs to determine whether the Customer Service Records were updated accurately.

This activity was repeated for the weeks of July 28, 2003 to August 1, 2003 and August 4, 2003 to August 8, 2003. A total of 450 orders were examined throughout the course of the three-week examination.



3.0 Review of SBC Midwest Planned Actions

The following table is a summary of the third party examination results of SBC Midwest's planned actions.

SBC Midwest Actions

ID

Third Party Examination Results

Training Review Sessions

- SBC developed for Local Service Center ("LSC") 1 service representatives a Service Order Quality informational package directed at improving service representative order accuracy. The package is similar in form to the Student Guides provided during training to service representatives involved in producing SBC Customer Information System ("ACIS") service orders. This package provides information such as the importance of accurate orders, and the impacts of inaccurate orders on CLECs and endusers. The package includes service order examples and a listing of available on-line resources. This package was completed December 31, 2002, and applies across the entire SBC Midwest region. Starting in January 2003, service representatives will receive training using the Service Order Quality informational package.
 - The training is scheduled to be completed by May 31, 2003 with a majority of targeted Service Representatives trained by March 31, 2003.
 - The intended audience for training is service representatives that produce and process Resale and UNE-P service orders for the ACIS system.
 - Review of the package is accomplished in mandatory training sessions facilitated by SBC's Training Department. Logs will be maintained to track attendance and manage attendance compliance.

A General Manager, Area Manager or Line Manager will address each class with a list of Talk Points to emphasize management's commitment to service order accuracy. BearingPoint was provided copies of the Service Order Quality informational package provided to SBC service representatives, as well as the Facilitator's Notes used to lead the training.

BearingPoint attended the training session conducted on May 7, 2003. The training session was conducted at the Local Service Center (LSC) in Grand Rapids, Michigan and was attended by Local Service Representatives from each of the LSCs.

The training began with "Talking Points" given by one of the Area Managers. The Talking Points emphasized the importance of the training and the need for accurate updates.

The training lasted approximately three hours and covered the impacts of inaccurate orders, ways to avoid incorrect order entries, and ways to correct an inaccurate order. The training concluded with a "Knowledge Check" made up of ten questions from the material in the training session. All of the Service Representatives were required to pass the Knowledge Check with 100 percent accuracy in order to receive credit for the training.

BearingPoint was provided with copies of the attendance records for the training, the list of Managers who addressed the class, and the list of "Talking Points" used by the Managers.



Management Review Activities

- SBC is designing an internal quality review process for CSI accuracy. This review will rely on sampling UNE-P and Resale production service orders that drop to manual handling ("manual-manual" and "auto-manual") to monitor CSI accuracy. Initially, the reviews are intended to be conducted daily.
 - Samples of orders will be pulled based on information in a reporting system called the Local Service Center Decision Support System ("DSS"). DSS is a reporting system used by the LSC to track and capture information on order activity. The DSS system is separate from the systems that process the actual production order.
 - The criteria for sampling will include product type and process type. Sampled orders will come from both manual-manual and automanual orders.
 - Quality Assurance ("QA") service representatives, experienced service representatives selected for this purpose, will conduct reviews using methods and procedures developed specifically for this process.
 - Potential order discrepancies will be reviewed to:
 - Verify that discrepancies are in fact errors:
 - Correct identified errors on pending orders:
 - Identify root causes of errors;
 - Provide the basis for individual coaching of service representatives.

The QA service representatives will compare the CLEC Local Service Request to the corresponding internal service order on a field-by-field basis. Corrections will be made as necessary.

BearingPoint interviewed members of the Quality Review team in Milwaukee, Wisconsin on June 16, 2003.

During the interview, BearingPoint was provided a copy of "Quality Assurance Methods & Procedures" for Resale and UNE-P products. These documents describe the quality review process used by SBC Midwest in detail.

BearingPoint was provided with copies of the "Error Coaching Plan" and "Coaching Forms". These forms are used to identify opportunities for coaching and facilitate the coaching of service representatives.

BearingPoint was provided with copies of the reports generated by the LSC Support Staff. These reports are provided to Area Managers, Line Managers, and Service Representatives to identify areas for improvement and to recognize teams and team members for achieving high accuracy rates.

BearingPoint was provided with a sample report used by SBC Midwest to identify common mistakes and descriptions regarding how to avoid these mistakes. The report is provided to Area Managers, Line Managers and Service Representatives on a weekly basis and also provides the number of errors found from the previous week's quality review.



4.0 Commercial Transaction Review Results

Week 3

Total

Using a random selection of commercial transactions completed from July 21, 2003 to August 8, 2003, BearingPoint reviewed customer service inquiry updates. Customer Service Records were examined to verify that the activities requested on LSRs were reflected accurately. If a subsequent customer order request was received between the date of a selected Local Service Request and the date that the CSI was examined, BearingPoint requested a copy of the subsequent order. These orders were examined as part of the sample.

Based on a review of 450 transactions, BearingPoint found that 446 (99.1 percent) had been updated accurately. Accordingly, BearingPoint's evaluation of SBC Midwest's Customer Service Inquiry Accuracy Update demonstrates that the 95% target has been achieved. This represents the same benchmark BearingPoint used during its operational testing. The following tables summarize the results of the transaction review.

 Examined
 Accurate
 Inaccurate
 Percentage

 Week 1
 150
 149
 1
 99.3%

 Week 2
 150
 150
 0
 100%

147

446

3

4

98.0%

99.1%

Table 1-1: Customer Service Inquiry Accuracy

150

450

	AB	BB	СВ	EB	MB	Total
Week 1	26	1	0	1	122	150
Week 2	23	8	0	3	116	150
Week 3	22	1	2	2	123	150
Total	71	10	2	6	361	450

Table 1-3: Transactions Examined by Activity Type⁴

	В	С	D	N	R	S	Т	V	Total
Week 1	3	23	27	22	2	11	2	60	150
Week 2	1	32	13	25	2	7	3	67	150
Week 3	0	33	21	19	2	11	2	62	150
Total	4	88	61	66	6	29	7	189	450

Table 1-4: Transactions Examined by State

	IL	IN	MI	ОН	WI	Total
Week 1	42	22	45	31	10	150
Week 2	39	16	41	38	16	150
Week 3	38	20	47	28	17	150
Total	119	58	133	97	43	450

³ Request Types: AB = Loop Service, BB = Loop Service with Number Portability, CB = Number Portability, EB = Resale Service, and MB = Combined Loop with Unbundled Local Switching.

⁴ Activity Types: B = Restore, C = Change, D = Disconnect, N = New Install, R = Record Change, S = Suspend, T = Outside Move, V = Conversion with Change.



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Repair Coding Accuracy Third Party Examination Results



September 18, 2003

1.0 Introduction

The Special and Unbundled Network Element (UNE) Circuit Repair Coding Accuracy Plan¹ ("the Plan") provides a list of the actions SBC Midwest asserted it would take as part of an effort to improve the accuracy and completeness of trouble ticket closure coding². The actions in the Plan fall into the following three categories:

- a. Documentation Updates: SBC Midwest asserted that it would initiate a number of improvements in the documentation available to technicians and managers on proper coding techniques and application.
- b. Training Review Sessions: SBC Midwest asserted that it would conduct comprehensive awareness and training sessions with personnel in each of the four work groups (Central Office [CO], Special Services, Installation and Repair [I&R] and the Local Operations Center [LOC]) involved in trouble ticket closures.
- c. Management Review Activities: SBC Midwest asserted that it would conduct its own internal reviews of trouble ticket closures in each of the four work groups involved to assess whether improvements to documentation and the training/awareness sessions achieved the desired affect (i.e., improvement in coding performance).

BearingPoint was selected to perform a third party examination of the actions stipulated in the Plan. The third party examination requirements as stated in the Plan fall into two categories:

- a. The third party will evaluate SBC Midwest's implementations of the actions described in the "Actions" section of the Plan by reviewing documents, conducting interviews, and performing site visits, as deemed necessary by the third party. This evaluation will include a review of SBC Midwest's quality review results.
- b. The third party will report on coding accuracy and completeness by comparing the trouble ticket coding applied to actual troubles found for UNE and Special Circuits to the narrative contained in the trouble report using a nonbiased sample from commercial production in the SBC Midwest region. The sample design and the evaluation methodology for this transaction analysis will be reviewed with SBC Midwest and the respective Commission Staffs prior to its implementation. In addition, BearingPoint may supplement its analysis using "ride-alongs" with repair technicians, consistent with its standard evaluation practices for UNE trouble reports in Michigan.

BearingPoint has fulfilled the third party examination requirements and considers its work completed. This document explains the results of BearingPoint's third party examination.

¹ As filed with the Michigan Public Service Commission on April 2, 2003, the Illinois Commerce Commission on May 1, 2003, the Wisconsin Public Service Commission on July 1, 2003, the Public Utilities Commission of Ohio on July 3, 2003, and the Indiana Utility Regulatory Commission on July 11, 2003.





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2.0 Methodology

BearingPoint developed an Examination Approach for the Repair Coding Accuracy Plan outlining the methodology used for the third party examination. The document describes the fact finding and analysis approach used to assess the evidence of SBC Midwest actions taken and the methodology used in performing a transaction review of commercial trouble ticket histories.

To evaluate the documentation updates made by SBC Midwest, BearingPoint requested copies of the specified documents for review. The documents used by the work centers were reviewed during work center visits to determine whether updated documentation was being used in trouble coding.

The evaluation of the training review sessions and the management review activities were completed through work center visits, employee interviews, and field work observations. BearingPoint reviewed documentation for pertinent information such as process descriptions, training schedules, employee training records, quality reports, samples of trouble tickets, discrepancies identified, root cause of discrepancies identified, and reports used for management oversight. Additionally, field work activity was used to collect information regarding SBC Midwest implementation of documented procedures.

Locations visited for interviews and observations were selected by BearingPoint from SBC Midwest's master list of work centers. BearingPoint selected technicians for ride-along observations from a list of qualified³ technicians expected on duty on a specific business day.

Prior to the examination of transactions, a process for selecting commercial UNE and Special troubles for review was established. BearingPoint requested SBC Midwest to provide a master list of CLEC trouble reports for a specified period of time. BearingPoint selected a sample from the master list for review and provided the sample list to SBC Midwest. In turn, SBC Midwest provided BearingPoint with the trouble histories and logs for the selected troubles.

BearingPoint established that a sample of 150 UNE troubles from Michigan⁴ and 50 Special troubles from the five state SBC Midwest region⁵ would be selected for review. The sample was drawn from troubles cleared/service restored during June 2003. Additionally, troubles observed on the two scheduled ridealong observations were included in BearingPoint's sample. In cases where a selected trouble could not be evaluated based on the narrative provided, BearingPoint removed this trouble from the sample and replaced it with the another trouble.

⁵ Although coding accuracy for specials in Wisconsin met the desired accuracy level, the random sample for transaction testing was taken from a master file of all specials for all five states.



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³ "Qualified technicians" in this context are those technicians that are assigned CLEC troubles as part of their normal work distribution.

⁴ UNE coding accuracy results were below the desired accuracy level only in Michigan.

3.0 Review of SBC Midwest Planned Actions

The following table is a summary of the third party examination results of SBC Midwest's planned actions.

ID	SBC Midwest Actions	Third Party Examination Results
	Documentation	n Updates
1	The SBC Midwest document that is used as a reference for Cause Codes was updated to clarify use of Cause Code 600 in late June 2002. Cause Code 600 is used to identify those situations where SBC Midwest is unable to determine what caused a particular case of trouble. This documentation gap was identified via a number of cited trouble tickets for both Special and UNE circuits. The updates to the documentation provided a clearer description of the process currently followed by SBC Midwest technicians and addressed questions raised by BearingPoint. The updated SBC Midwest document was provided to BearingPoint for review on August 1, 2002.	BearingPoint was provided a copy of the document SBC-660-169-014, "AMERITECH CAUSE CODES LOOP MAINTENANCE OPERATIONS SYSTEM (LMOS) AND WAFC", issued on June 9, 2002. The document includes an updated definition of Cause Code 600 removing restrictions for the disposition codes with which it can be used. During interviews and work center visits, BearingPoint observed that work groups were using the current definition for Cause Code 600.
2	Local Operations Center (LOC) Job Aid JA-27B has been updated to reflect additional steps for Maintenance Administrators (MA) to take that will improve coding accuracy when a mechanized loop test (MLT) indicates "Open Out" following a circuit retest. MAs and managing supervisors responsible for the accurate coding of closed trouble tickets in the LOC were covered on this process enhancement between August 1, 2002 and August 9, 2002.	BearingPoint was provided a copy of job aid LOC JA-27B, "Basic Questions to Ask-Resale/UNE-P", dated July 17, 2001 and revised on October 22, 2002. The document includes additional steps under the heading "Important: If testing a VER Code 41 or 0L (Open Out 100% Balanced) proceed with the following steps:" During an interview at the LOC, BearingPoint noted that this Job Aid was communicated through the "What's New" web page that employees are expected to review at the start of each day.



- SBC Midwest updated internal Methods and Procedures (M&P) documentation (SBC 660-169-013) used to define accurate disposition coding of trouble tickets to include new disposition codes and clarify the use of existing disposition codes. Updates to the M&P were completed on August 16, 2002. These updates also generated the following outputs:
 - Installation and Repair (I&R) internal Job Aid (JA 170 - August 20) was updated to reflect the M&P changes/clarifications. Awareness sessions were conducted August 23, 2002 through November 5, 2002 to review updated procedures.
 - A LOC "Flash" (02RC49) was issued August 26, 2002 to reflect the new disposition codes.

The Customer Service Bureau (CSB) Handbook was updated August 26, 2002 to reflect the new disposition codes. SBC Midwest issued a CSB "Flash" to notify CSB personnel of updated handbook procedures.

BearingPoint was provided a copy of SBC-660-169-013, "AMERITECH DISPOSITION CODES LOOP MAINTENANCE OPERATION SYSTEM (LMOS) and WFAC", issued August 17, 2002 and updated July 18, 2003. SBC Midwest provided a copy of job aid SBC-JA-000-000-170 issued August 16, 2002.

BearingPoint conducted interviews with two SBC Midwest I&R Field groups, one I&R Control Center and the LOC. During the first I&R Field group interview, Job Aid JA 170 was unavailable for review. Additionally, the primary Job Aid utilized by technicians (SBC-JA-000-000-043) was outdated in both the paper and online versions. This issue was raised with SBC Midwest, which took corrective action.

During a second interview, BearingPoint observed that the online document was updated. The technicians indicated that the online documentation was to be a primary source of coding information. Additionally, paper copies of coding documentation had been removed from the vehicles, according to the technicians interviewed.

With respect to Awareness Training, SBC Midwest managers indicated that both formal and informal training is provided to the technicians. After completion, formal training is documented in employee personal training records in the Training Information Warehouse (TIW) database. Informal training (or "Tailgate Training") is provided as work assignments are distributed. This ordinarily includes a handout or job aid along with a brief overview. Informal training does not require employee training record updates.

At the first I&R Field interview, SBC Midwest provided a copy of a "Tailgate Training" handout which indicated that coding-specific training was conducted in August 2002. At the second I&R Field interview, TIW database records were reviewed. The August 2002 training was found posted to employee records.

During BearingPoint's review at the LOC, BearingPoint observed that both the "What's New" web page and the updated online CSB Handbook were updated with the information from the 02RC49 Flash.



4 On December 16, 2002 Central Office
Technician method and procedure
documentation (SBC 002-216-298) was issued
for documenting corrective maintenance trouble
tickets in Central Offices (COs). A requirement
for performing quality checks on coding has also
been incorporated into the frame management
document SBC 002-531-045 (CO Managers
Frame Reference Guide – AIT Region).

BearingPoint was provided a copy of the document SBC-002-216-298, "TRANSPORT & FRAME: WFA/DI Corrective Maintenance Trouble Tickets", dated November 18, 2002.

The document includes instruction as to the types of conditions found in the CO requiring a corrective maintenance trouble ticket. It also explained how to issue and close such trouble tickets.

BearingPoint was provided a copy of the document SBC-002-531-045, "Frame Midwest: CO Manager's Frame Reference Guide", dated April 9, 2003.

This document includes "Apply the proper Disposition and Cause Codes" in the list of work functions to be observed in the quality review process.

During an interview with a CO Manager on July 31, 2003, it was noted that each week one completed work operation (processing of trouble report, independent work request, etc.) for each individual is reviewed for quality and thoroughness. If a work activity under review involved completion of a repair, the codes used were reviewed for accuracy.



Training Review Sessions

- SBC Midwest conducted training review sessions (a/k/a awareness sessions) to reinforce current procedures used for the close-out of Cable Multiple tickets when wholesale account trouble tickets are attached to the lead cable trouble ticket number. Sessions covering all Installation and Repair (I&R) Operations Center personnel were completed by August 13, 2002. A "Cable Multiple" ticket number is assigned to a damaged cable or cable failure that potentially impacts service to multiple subscribers served by the same cable. Individual subscriber (or CLEC) reports of service interruptions having individually assigned trouble ticket numbers may become attached to the lead or Multiple Cable Trouble Ticket Number (CTTN). SBC Midwest was made aware that in at least two audited instances, individual wholesale trouble reports attached to a Cable Trouble Ticket Number were closed as the CTTN closed and were not "detached" and tested to confirm restoration of the reported trouble. Reinforcement of current procedures to detach individual case trouble tickets from the CTTN and retest with the CLEC was completed for I&R Operations Center employees through Awareness Sessions conducted between August 8, 2002 and August 15, 2002.
- SBC Midwest's Wholesale Staff distributed the new process to work centers with a requirement to complete training by August 13, 2002. Each work center was required to return a confirmation notice indicating that training was complete.

BearingPoint was provided copies of the e-mail confirmations returned from the work centers stating the training was completed.

During the interview with the I&R Control Center on June 19, 2003, BearingPoint requested evidence that training was performed as reported. The I&R Control Center provided a copy of the training schedule indicating the topic of training, the names of employees that attended training, the dates training took place, and a copy of the handout provided during training.

- 6 SBC Midwest conducted awareness sessions to reinforce current procedures used for the disposition coding of trouble reports closed when multiple faults are found on the same telephone line.
 - Sessions covering Installation and Repair field technicians in all manager groups were completed by August 12, 2002.
 - Additional training sessions with I&R personnel were conducted in November 2002.

BearingPoint was provided with confirmation messages indicating that the training was complete. During interviews, I&R Managers indicated that the technicians understood the rule and verified that training was performed as documented. I&R Control Center personnel, while not specifically required, also were trained regarding the process.

SBC Midwest noted that the training session provided in November 2002 covered the newly updated I&R Maintenance "No Access" Policy. This training did include coding information, but was not specific to coding awareness.



	7	Additional review sessions for LOC personnel were conducted to reinforce accurate trouble closure procedures were completed by November 10, 2002.	In an interview with LOC personnel on July 1, 2003, BearingPoint requested evidence of the training session. Training staff in the LOC provided a copy of the training agenda showing topics covered and a training schedule listing each employee trained.
			BearingPoint selected four names from the master list and requested copies of the individual employee training files from the TIW system. All four employee files included entries showing attendance the same date as reflected on the training schedule.
	8	Review training sessions were conducted with Special Service Center personnel to reinforce correct trouble ticket coding procedures. These review sessions were completed by November 25, 2002.	SBC Midwest personnel sent an e-mail to the Special Services Organizations explaining that awareness sessions with the InterExchange Carrier (IECC), General Business Center–West (GBC-W), General Business Center-East (GBC-E), AT&T, and Special Service Centers were to be completed by November 25, 2002. Each organization was required to return a confirmation notice indicating that training was completed.
			SBC Midwest provided BearingPoint with copies of the e-mail notification correspondence and copies of the responses indicating that training requirements were met and training had been completed.
١			<u></u>

During subsequent interviews with the Area Managers, BearingPoint was made aware that initial training sessions were requested for all employees in trouble ticket coding procedures. Area Managers were unable to confirm that the email responses reference the initial training or the review sessions. The managers stated that trouble ticket coding procedures are regularly covered topics during informal training sessions,

but that these training sessions are not

documented.



9	Review sessions were conducted through January 31, 2003 with SBC Midwest Central Office technicians in Michigan, Ohio, Indiana, and Illinois manager groups to review the newly created Methods and Procedures for documenting trouble tickets and established procedures for proper trouble ticket coding.	SBC Midwest provided BearingPoint e-mail correspondence indicating that the training occurred. On July 31, 2003, during an interview with the CO Manager in the Farmington, Michigan Central Office, BearingPoint requested documentation demonstrating that training was completed. The CO Manager provided an e-mail indicating the requirement to cover specific coding related topics and the response that was returned by his organization. Additionally, the CO Manager provided a copy of his confirmation notice indicating that training was completed with an attached document showing the topic covered, names of those trained, and the date that training took place.
10	On February 10, 2003, the LOC began conducting workshops to review closure codes and appropriate usage of these codes. These workshops will continue until the desired level of accuracy is achieved.	During an interview with members of the LOC, BearingPoint requested LOC documentation related to the establishment of workshops for the purpose of reviewing closure codes and appropriate usage of these codes. The LOC provided documentation and stressed their establishment of a 98% coding accuracy requirement for employees rather than the 95% required by SBC Midwest. The LOC provided BearingPoint with an overview of the workshop program and a copy of the "Discussion Outline" used in training with a list of reference documentation used. Additionally, BearingPoint was provided a list of names of those trained, and the date that training took place. Also, BearingPoint was provided with evidence showing that on-going training was being conducted, which began on July 9, 2003.
11	On February 3, 2003, LOC associates were provided visual aids to identify commonly made coding errors and the recommended corrective actions.	SBC Midwest provided BearingPoint with copies of visual aids used by the LOC to develop an awareness of common coding errors with associates. Additionally, BearingPoint observed the posters throughout the work areas within the LOC. The posters are designed to draw attention to some potential errors in coding.
12	A coding refresher review session will be conducted within each of the four work groups (i.e., LOC, I&R, Special Services Center and Central Office) within one year of the training sessions described above (August 2002 Awareness).	BearingPoint conducted interviews with each of the four organizations between June 15, 2003 and July 31, 2003. The annual review sessions were not scheduled to begin until after August 1, 2003. BearingPoint was provided with documentation indicating that training began on August 5, 2003. The documentation indicated the topics covered, names of those trained, and the date that training took place.



13 Training packages for new technicians in all four work centers already contain trouble disposition and coding and will continue to be part of the training program.

During interviews, BearingPoint was provided training documentation from each of the four groups. BearingPoint noted that trouble disposition and coding are part of new employee training. Additionally, through work observations, it was noted that system training for each group had coding elements included.

Management Review Activities

14 Local Operating Center Review:

On October 30, 2002, LOC management initiated monthly quality reviews of coding accuracy on employee trouble tickets closures.

BearingPoint interviewed LOC employees on July 1, 2003 and observed work activity focusing on improving coding accuracy.

During the interview, the LOC provided BearingPoint a copy of the monthly quality review process. The review was structured with stated requirements for Front Line Managers, the Operations Manager, and the Area Manager. The process provided the steps to be followed in performing the monthly quality review and specified data storage requirements. A copy of the LOC Quality and OB Form used for scoring reviews was provided.

BearingPoint was provided a copy of the Front Line Manager Expectations document, which outlines specific duties and activities Front Line Managers are expected to perform as part of the normal job. One of the items listed was "Perform quality observations and quality checks" and the Performance Standard for this item notes, "two observations and three quality checks are performed monthly on each team member. Success Plans are necessary when employee performance is unsatisfactory."

The LOC personnel explained that Success Plans are utilized for employees with unsatisfactory job performance. The Front Line Manager is responsible for preparing a corrective action plan to help the employee obtain additional training, closer supervision or whatever is determined to be appropriate to improve performance.

The LOC allowed BearingPoint to observe Front Line Managers performing quality reviews. BearingPoint observed both the LMOS and WFA/C groups performing quality reviews, which included coding accuracy. The quality reviews performed were consistent with the published process.



15 In December 2002, LOC management initiated bimonthly random reviews of trouble ticket closures. The results of these reviews are tracked and reported via an internal shared-access tracking mechanism.

During the July 1, 2003 interview with the LOC, BearingPoint requested evidence supporting the bimonthly review of trouble ticket closures.

The LOC provided a written copy of the process, which outlined the responsibilities of management employees, including the process steps, data storage requirements, and requirements for data retrieval for audit purposes.

BearingPoint was provided a detailed explanation of the process and allowed to observe the aspects of the process in progress at the time. The process observed was consistent with the published process.

On February 10, 2003, LOC management initiated a "Ticket Closure Approval Team" for Resale/UNE-P trouble tickets.

LOC MAs will be required to receive approval prior to closing a trouble ticket until an individual 95% accuracy rate is achieved.

During the July 1, 2003 interview and observation meeting at the LOC, BearingPoint requested documentation supporting the implementation and execution of the new Ticket Closure Approval Team and associated process.

The LOC provided a copy of Flash 03JT01, "Ticket Closure Approval Process", dated February 27, 2003. This document describes the process used to close LMOS trouble tickets.

Employees that have achieved a 95% accuracy level and have closed 40 or more troubles are qualified to close LMOS troubles without a review. However, other employees are required to put the appropriate codes in the narrative along with a description of the work completed and place a trouble in a status of "IIHOLD" for review and closure by a qualified employee.

BearingPoint observed troubles placed in "IIHOLD", which were subsequently reviewed and closed. The observed process was consistent with the published process.

BearingPoint was provided copies of master tracking spreadsheets as well as the individual team qualification spreadsheet.



17 On February 10, 2003 LOC management also initiated a daily review of the prior day's UNE-Loop trouble ticket closures to validate correct trouble ticket and analysis codes.

MA errors are provided to the involved employee as well as the LOC staff, both as a method to improve the individual accuracy, as well as identify common misinterpretations.

During the interview and observation meeting with the LOC on July 1, 2003, the review of the previous day's UNE-Loop troubles was discussed. BearingPoint was provided a copy of the process for receipt, sorting, and review of the daily scrub list.

BearingPoint observed the review of UNE-Loop trouble ticket closures. As each trouble was reviewed, the reviewer would place a code in the SFI field in WFA/C that would represent the findings. Based on the SFI code used, the LOC can pull reports, identify errors, and review accuracy rates.

18 | Special Services Center Review:

To monitor the accuracy and completeness of trouble ticket coding, the trouble ticket coding review has been incorporated into the regularly scheduled quality control measures utilized by the Special Services management. This effort began December 2002.

SBC Midwest provided a copy of the new ticket review procedure to BearingPoint.

On June 19, 2003, BearingPoint reviewed the new ticket review procedure with representatives from the IECC and GBC-E centers. The coding awareness was part of the review process as documented.

At the end of the employee quality review, the results are posted to a Maintenance Quality Checklist form. This form shows the accuracy of each trouble report reviewed and the monthly average. This record informs employees of their current efficiency level and is used in the employee evaluation at the end of the year.

19 Installation and Repair Centers Review:

The I&R management will incorporate coding accuracy into the current auditing processes to review the efficacy of the above-cited measures and identify corrective action when required to improve trouble ticket coding accuracy for Special and UNE circuit trouble reports.

In addition to the work group quality reviews, SBC Midwest has initiated a monthly staff audit. BearingPoint interviewed the Staff Quality Results Manager on June 19, 2003. The Staff Quality Results Manager is responsible for the execution of the monthly staff audit and develops a monthly report across the 70 Area Manager domains.

BearingPoint conducted interviews and observations with I&R Field and I&R Control Center managers on June 19, 2003 and found that both are required to perform quality reviews of closed repair tickets and that coding was a key element of each review.

BearingPoint noted that Field Front Line Managers are required to review at least two troubles per employee per month. They are required to use a mechanized form. Results are posted online and included in employee evaluations. BearingPoint was allowed to observe as several trouble tickets were reviewed and results scored.



20 Central Office Review:

Beginning in March 2003, a monthly sample of closed CLEC trouble tickets in Michigan will be reviewed for narrative and coding accuracy.

On July 21, 2003, BearingPoint interviewed the Manager responsible for the execution of the monthly Central Office (CO) CLEC trouble ticket review.

The manager provided BearingPoint with a written copy of the process steps used to review closed trouble tickets. According to the manager responsible for the monthly CO CLEC trouble ticket review, between 200 and 300 troubles are reviewed each month.

The Training and Development Manager is required to produce a report containing the following fields:

- Category of Report (CO)
- Base (number evaluated)
- Number Closed Accurately
- Number Closed Inaccurately, and
- Percent Closed Accurately

ISO9000 audit process was discussed.

21 International Organization for Standardization (ISO) Audits Review:

In addition to these targeted coding review sessions SBC Midwest has incorporated trouble ticket coding into its internal ISO audits which are conducted approximately every three months within the various work centers. If significant ticket coding problems are identified during these ongoing audits, SBC Midwest will initiate new training/awareness sessions with the groups involved.

to various levels within the company.

BearingPoint interviewed the Quality Assurance
Manager responsible for the ISO Audit program
on June 25, 2003. During the interview, the

A copy of the summary report is to be forwarded

To be an auditor, an employee must show interest and volunteer to join the audit team. Local management selects the most qualified employees to form the audit team. If selected, employees are provided four days of training covering the process, forms, reports, roll play sessions, and testing. On the third day of training, a test is administered -- to continue in the program an employee must score a minimum of 80 percent on the test.

Employees assist a lead auditor for three or four audits before they can lead an audit.

BearingPoint accompanied the ISO Audit Team on July 15, 2003 and observed the performance of an audit in the Field Dispatch Center responsible for dispatching work to central office technicians. BearingPoint observed the pre-audit preparation session and the audit through ticket review. The ticket review portion of the audit included a review of codes.



4.0 Commercial Transaction Review Results

Using a random selection of commercial troubles completed in the month of June 2003, BearingPoint performed a review of UNE troubles in Michigan and a review of Specials troubles taken from a five-state area master list to evaluate coding accuracy.

- UNE Results: Based on a review of 154 UNE troubles, the repair coding accuracy in Michigan was found to be 98.38 percent. SBC Midwest has met the target accuracy level of 95 percent as stated in the plan.
- Specials Results: Based on a review of 51 Special troubles, the repair coding accuracy in SBC Midwest was found to be 94.12 percent⁶. SBC Midwest has met the target accuracy level of 90 percent as stated in the plan.

The following table reflects the number of specials troubles reviewed across the SBC Midwest area:

Table 1-1: Specials Troubles Examined by State

State	Number
Michigan	9
Ohio	10
Wisconsin	6
Illinois	26
Indiana	0
Total	51

⁶ This result would meet the 95% accuracy benchmark used for UNE Specials in the OSS test when the p-value (0.4725219) is taken into consideration.



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Directory Listings and Directory Assistance Database Update Accuracy Third Party Examination Results



September 15, 2003

1.0 Introduction

The Directory Listings (DL) and Directory Assistance (DA) Database Update Accuracy Plan¹ ("the Plan") provides a list of the actions SBC Midwest asserted it would take as part of an effort to improve the accuracy of DL/DA database updates². The actions in the Plan fall into the following three categories:

- a. System and Process Enhancements: SBC asserted that it would implement a mechanical process to route orders identified by the "Skipped Section Report3" into the established Advance Listing Products and Services System (ALPSS) error handling process.
- b. Service Representative Training: SBC Midwest asserted that it would develop a Service Order Quality informational package for Local Service Center ("LSC") service representatives. This package provided information such as the importance of accurate orders and the impacts of inaccurate orders on Competitive Local Exchange Carriers ("CLECs") and end-users. The informational package was to include service order examples and a listing of available on-line resources.
- c. Management Review Activities: SBC Midwest asserted that it would conduct its own internal reviews of UNE-P and Resale production service orders that drop to manual handling to assess whether system and process enhancements and training review sessions achieved the desired affect (i.e., improvement in directory listing update accuracy).

BearingPoint was selected to perform a third party examination of the actions stipulated in the Plan. The third party examination requirements as stated in the Plan fall into two categories:

- a. The third party will evaluate SBC Midwest's implementations of the actions described in this Plan by reviewing documents, conducting interviews, and performing site visits. This evaluation will include a review of SBC Midwest's quality review results.
- b. The third party will report the accuracy of DL/DA updates by comparing the updates with local service requests using an unbiased sample from the entire population of commercial production in the SBC Midwest region. The sample design and the evaluation methodology for this transaction analysis will be reviewed with SBC Midwest and the respective Commission Staff prior to its implementation.

BearingPoint has fulfilled the third party examination requirements and considers its work completed. This document explains the results of BearingPoint's third party examination.

³ The "Skipped Section Report was a daily report containing service orders which could not be added to the ALPS system due to unanticipated error conditions (e.g., duplicate telephone number, corrupted data, etc.). This report was used to investigate the root causes and the necessary corrective actions to resolve these errors.



As filed with the Michigan Public Service Commission on March 13, 2003, the Illinois Commerce Commission on May 1, 2003, the Wisconsin Public Service Commission on July 1, 2003, the Public Utilities Commission of Ohio on July 3, 2003, and the Indiana Utility Regulatory Commission on July 11, 2003.

This issue is related to Exception 52 in Michigan.

2.0 Methodology

BearingPoint developed an Examination Approach for the Directory Listings and Directory Assistance Database Update Accuracy Plan outlining the methodology used for the third party examination. The document describes the fact finding and analysis methodology used to assess the evidence of SBC Midwest actions taken and the methodology used in performing a transaction review of commercial transactions to verify the DL/DA database update accuracy.

To evaluate the system and process enhancements made by SBC Midwest, BearingPoint requested artifacts of the enhancements for review. The evaluation of the training review sessions and the management review activities were completed through work center visits and employee interviews. BearingPoint reviewed documentation for pertinent information such as process descriptions, training schedules, employee training records, quality reports, discrepancies identified, root cause of discrepancies identified, and reports used for management oversight.

SBC Midwest provided BearingPoint with a list of all orders that completed during the week of July 21, 2003 to July 25, 2003. The list contained relevant ordering information, as well as the completion date for each of the orders.

BearingPoint selected a sample of 150 orders from the entire population⁴. BearingPoint reviewed hard copies of the Local Service Requests ("LSRs") for each order. BearingPoint visited the Directory Listings Service Center in Troy, Michigan and reviewed the directory listings database. BearingPoint pulled the account information in the directory listings database by the telephone number on the corresponding LSR. BearingPoint compared the information received on LSRs to information in the directory listings database to determine whether the directory listings were updated accurately.

This activity was repeated for the weeks of July 28, 2003 to August 1, 2003 and August 4, 2003 to August 8, 2003. A total of 450 orders were examined throughout the course of the three-week examination.

⁴ BearingPoint removed facilities based transactions (Request Type = "AB" [Loop Service] or "BB" [Loop Service with Number Portability]) from the sample because these transactions do not generate directory listing updates and because the accounts associated with the LSRs are identified with circuit IDs, not telephone numbers.



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3.0 Review of SBC Midwest Planned Actions

The following table is a summary of the third party examination results of SBC Midwest's planned actions.

ID	SBC Midwest Actions	Third Party Examination Results
	System and Process	s Enhancements
1	SBC installed vendor software updates to allow automated daily transfers of Mechanized Order Receipt ("MOR") files to the ALPSS in December 2002. This automated task replaces a manual process that was performed periodically throughout the day and occasionally executed prior to the MOR data being available, thus delaying the updateThis enhancement will ensure an improvement in timely receipt of mechanized order, as manual intervention will be minimized/eliminated.	BearingPoint was provided artifacts of the implementation of vendor software updates. The documentation provided states that the system upgrade was implemented on December 11, 2002 and that after verification the associated defect report was closed on December 18, 2002. SBC indicated that the daily transfer of data from MOR to ALPSS was an artifact of LSOG4 ⁵ , which is no longer used by CLECs, and therefore the issue should no longer be encountered.
2	SBC will implement a long term mechanical process to route orders identified by the "Skipped Section Report" into the established ALPSS error handling process by March 1, 2003. While not replacing the "Skipped Section Report" manual work process, this enhancement will further automate the ALPSS error handling and minimize manual processes by better identifying errors that would otherwise be handled manually.	BearingPoint was provided with a "News Flash" and "M & P" for the "Skipped Section Report". These documents were provided to White Pages Staff personnel of the Listings Service Center by SBC Midwest. Also, BearingPoint was provided a copy of the "Skipped Section Report Process Log". The log was for the time period of January 14, 2003 to May 28, 2003. The log shows a reduction in the number of orders which dropped to manual processing after March 1, 2003 ⁶ .

⁵ LSOG4 was retired on June 14, 2003. ⁶ In the two weeks prior to March 1, 2003, there were 25 service orders identified in the "Skipped Section Report". In the two weeks proceeding March 1, 2003, there was one service order identified in the "Skipped Section Report".



Training Review Sessions

- SBC developed for Local Service Center ("LSC") service representatives a Service Order Quality informational package directed at improving service representative order accuracy. The package is similar in form to the Student Guides provided during training to service representatives involved in producing SBC Customer Information System ("ACIS") service orders. This package provides information such as the importance of accurate orders, and the impacts of inaccurate orders on CLECs and endusers. The package includes service order examples and a listing of available on-line resources. This package was completed December 31, 2002, and applies across the entire SBC Midwest region. Starting in January 2003, service representatives will receive training using the Service Order Quality informational package.
 - The training is scheduled to be completed by May 31, 2003 with a majority of targeted Service Representatives trained by March 31, 2003.
 - The intended audience for training is service representatives that produce and process Resale and UNE-P service orders for the ACIS system.
 - Review of the package is accomplished in mandatory training sessions facilitated by SBC's Training Department. Logs will be maintained to track attendance and manage attendance compliance.

A General Manager, Area Manager or Line Manager will address each class with a list of Talk Points to emphasize management's commitment to service order accuracy. BearingPoint was provided copies of the Service Order Quality informational package provided to SBC service representatives, as well as the Facilitator's Notes used to lead the training.

BearingPoint attended the training session conducted on May 7, 2003. The training session was conducted at the Local Service Center (LSC) in Grand Rapids, Michigan and was attended by Local Service Representatives from each of the LSCs.

The training began with "Talking Points" given by one of the Area Managers. The Talking Points emphasized the importance of the training and the need for accurate updates.

The training lasted approximately three hours and covered the impacts of inaccurate orders, ways to avoid incorrect order entries, and ways to correct an inaccurate order. The training concluded with a "Knowledge Check" made up of ten questions from the material in the training session. All of the Service Representatives were required to pass the Knowledge Check with 100 percent accuracy in order to receive credit for the training.

BearingPoint was provided with copies of the attendance records for the training, the list of Managers who addressed the class, and the list of "Talking Points" used by the Managers.



Management Review Activities

- 4 SBC is designing an internal quality review process for DL/DA accuracy. This review will rely on sampling UNE-P and Resale production service orders that drop to manual handling ("manual-manual" and "auto-manual") to monitor DL/DA accuracy.
 - Initially, the reviews are intended to be conducted daily.
 - Samples of orders will be pulled based on information in a reporting system called the Local Service Center Decision Support System ("DSS"). DSS is a reporting system used by the LSC to track and capture information on order activity. The DSS system is separate from the systems that process the actual production order.
 - The criteria for sampling will include product type and process type. Sampled orders will come from both manual-manual and automanual orders.
 - Quality Assurance ("QA") service representatives, experienced service representatives selected for this purpose, will conduct reviews using methods and procedures developed specifically for this process.
 - Potential order discrepancies will be reviewed to:
 - Verify that discrepancies are in fact errors:
 - Correct identified errors on pending orders;
 - Identify root causes of errors;
 - Provide the basis for individual coaching of service representatives.

The QA service representatives will compare the CLEC Local Service Request to the corresponding internal service order on a field by field basis. Corrections will be made as necessary.

BearingPoint interviewed members of the Quality Review team in Milwaukee, Wisconsin on June 16, 2003.

During the interview, BearingPoint was provided a copy of "Quality Assurance Methods & Procedures" for Resale and UNE-P products. These documents describe the quality review process used by SBC Midwest in detail.

BearingPoint also was provided with copies of the "Error Coaching Plan" and "Coaching Forms". These forms are used to identify opportunities for coaching and facilitate the coaching of service representatives.

BearingPoint was provided with copies of the reports generated by the LSC Support Staff. These reports are provided to Area Managers, Line Managers, and Service Representatives to identify areas for improvement and to recognize teams and team members for achieving high accuracy rates.

BearingPoint was provided with a sample report used by SBC Midwest to identify common mistakes and describe how to avoid these mistakes. The report is provided to Area Managers, Line Managers and Service Representatives on a weekly basis and also provides the number of errors found from the previous week's quality review.



4.0 Commercial Transaction Review Results

Using a random selection of commercial transactions completed from July 21, 2003 to August 8, 2003, BearingPoint reviewed the directory listing updates⁷.

Local Service Requests entered with a Directory Listing form requesting an update to the customer's DL were considered accurate if the information in directory listings database was consistent with the information in the LSR.

Local Service Requests entered to migrate service from SBC or a CLEC to another CLEC, but which did not include a Directory Listing form, should generate an update in the directory listings database to update the Company Code. These orders were considered accurate if the directory listings database shows an update was made which corresponds with the LSR.

Local Service Requests entered to update features on the line, but which did not include a Directory Listing form, should not generate an update in the directory listings database. These orders were considered accurate if the directory listings database shows that no update was made to correspond with the LSR.

When a subsequent customer order request was received between the date of the selected Local Service Request and the date that the directory listings database was examined, BearingPoint requested a copy of the subsequent order. These orders were examined as part of the sample.

BearingPoint examined 382 transactions and found that 378 (99.0 percent) were updated accurately in the directory listings database. Accordingly, BearingPoint's evaluation of SBC Midwest's Directory Listings and Directory Assistance Database Update Accuracy demonstrates that the 95% target has been achieved. This represents the same benchmark BearingPoint used during its operational testing. The following tables summarize the results of the transaction review.

Table 1-1: DL/DA Database Update Accuracy

	Examined	Excluded	Accurate	Inaccurate	Percentage
Week 1	150	20	127	3	97.7%
Week 2	150	22	128	0	100.0%
Week 3	150	26	123	1	99.2%
Total	450	68	378	4	99.0%

Table 1-2: Transactions Examined by Request Type⁸

	AB	BB	СВ	EB	MB	PB	Total
Week 1	17	3	4	4	121	1	150
Week 2	20	2	1	3	124	0	150
Week 3	25	0	2	2	121	0	150
Total	62	5	7	9	366	1	450



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⁷ BearingPoint found one instance in which the directory listing on the LSR was submitted by the CLEC inaccurately. The order processed and the system updated the customer's directory listing, but the listed name in the directory listing did not match the LSR. This order was removed from the sample.

⁸ Request Types: AB = Loop Service, BB = Loop Service with Number Portability, CB = Number Portability, EB = Resale Service, MB = Combined Loop with Unbundled Local Switching, and PB = Centrex Resale Services.

Table 1-3: Transactions Examined by Activity Type⁹

	В	С	D	N	R	S	Т	V	Υ	Total
Week 1	4	29	26	16	1	10	2	61	1	150
Week 2	3	23	17	16	2	9	0	79	1	150
Week 3	6	31	21	24	0	9	5	54	0	150
Total	13	83	64	56	3	28	7	194	2	450

Table 1-4: Transactions Examined by State

	IL	IN	MI	ОН	WI	Total
Week 1	44	17	39	34	16	150
Week 2	47	22	34	34	13	150
Week 3	49	16	43	34	8	150
Total	140	55	116	102	37	450

 $^{^{9}}$ Activity Types: B = Restore, C = Change, D = Disconnect, N = New Install, R = Record Change, S = Suspend, T = Outside Move, V = Conversion with Change, and Y = Deny/Short Term Suspension.



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